

BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

910 Franklin Avenue
Suite 200
Garden City, NY 11530
Tel. No. 516.248.5550
Fax No. 516.248.6027

November 23, 2022

Via ECF

The Honorable Steven Tiscione
United States Magistrate Judge for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Nolan v. City of New York et al., Case No. 19-cv-00187-RPK-ST

Dear Judge Tiscione:

This office represents Plaintiff, William R. Nolan, in the above-referenced action brought against Defendants, the City of New York (“City”), and various individuals, for alleged violations of Plaintiff’s First, Second, and Fourth Amendment rights. We write now, with the City’s consent, to respectfully request an adjournment of Plaintiff’s time to file his Amended Complaint, from the current deadline of November 30, 2022, (ECF 52), to December 30, 2022. This is Plaintiff’s first request for an adjournment of this deadline. This adjournment is requested due to Plaintiff’s need for additional time to draft his Amended Complaint in light of the intervening holidays, as well as the voluminous materials that our office needs to review and synthesize before doing so.

We thank the Court for its attention to this matter.



Andrew C. Weiss, Esq.
For the Firm

To: All counsel of record (*via ECF*)